1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 9 10 THE BOARD OF TRUSTEES FOR THE ALASKA CARPENTERS DEFINED NO. 2:22-cy-01337-JNW 11 CONTRIBUTION TRUST FUND, STIPULATED MOTION AND ORDER 12 Plaintiff, FOR EXTENSION OF DEADLINE FOR **DEFENDANT TO FILE ANSWER TO** 13 PLAINTIFF'S COMPLAINT VS. 14 PRINCIPAL LIFE INSURANCE CO., **NOTED FOR MOTION ON: NOVEMBER 16, 2023** 15 Defendant. 16 17 STIPULATED MOTION FOR EXTENSION OF TIME 18 Defendant Principal Life Insurance Co. ("Defendant") and Plaintiff The Board of 19 20 Trustees for the Alaska Carpenters Defined Contribution Trust Fund ("Plaintiff"), by and 21 through their undersigned counsel, stipulate to a limited extension of time for Defendant to file 22 its Answer to Plaintiff's Complaint. 23 On September 21, 2022, Plaintiff filed its Complaint. Dkt. 1. On November 15, 2022, 24 Defendant filed its Motion to Dismiss. Dkt. 14. After the parties completed their briefing on 25 26 **GORDON REES SCULLY** STIPULATED MOTION MANSUKHANI, LLP TO EXTEND TIME - 1 701 Fifth Avenue, Suite 2100 2:22-cv-01337-JNW Seattle, WA 98104 Telephone: (206) 695-5115

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Defendant's Motion to Dismiss, the Court entered its order denying the motion on November 3, 2023. Dkt. 27. Accordingly, Defendant's Answer to Plaintiff's Complaint is currently due November 17, 2023.

The parties have conferred in good faith and believe that an extension of two weeks is necessary given the complexity of Plaintiff's Complaint and allegations, Defendant's counsel's need to confirm Defendant's answers to the same with their client, and the upcoming Thanksgiving Holiday. The requested extension of time will not affect any other deadlines in this case.

Therefore, the Parties respectfully request that the Court extend the due date for Defendant to file its Answer to Plaintiff's Complaint from November 17, 2023 to December 1, 2023.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD on this 16th day of November, 2023.

Dated: November 22, 2023 GORDON REES SCULLY MANSUKHANI, LLP

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1 Dated: November 22, 2023 GROOM LAW GROUP, CHARTERED 2 <u>/s/ Samuel I. Levi</u>n Samuel I. Levin (admitted *pro hac vice*) 3 1701 Pennsylvania Ave., NW, 4 **Suite 1200** Washington, DC 20006 Tel: (202) 857-0620 5 slevin@groom.com Attorneys for Defendant Principal Life 6 Insurance Co. 7 8 Dated: November 22, 2023 BARLOW COURGHAN MORALES & JOSEPHSON, P.S. 9 By: /s/ Noelle E. Dswarzki Noelle E. Dswarzki, WSBA #40041 10 Jeffrey G. Maxwell, WSBA #33503 1325 Fourth Avenue, Suite 910 11 Seattle, WA 98101 Phone: (206) 224-9900 12 Fax: (206) 224-9820 noelled@bcmjlaw.com 13 jeffreym@bcmjlaw.com 14 Attorneys for Plaintiff The Board of Trustees for the Alaska Carpenters Defined Contribution Trust Fund 15 16 17 18 19 20 21 22 23 24 25 26 **GORDON REES SCULLY** STIPULATED MOTION MANSUKHANI, LLP TO EXTEND TIME - 3

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ORDER

Based on the foregoing stipulated motion of the parties, therefore, IT IS HEREBY ORDERED THAT the due date for the Defendant's Answer to Plaintiff's Complaint is extended from November 16, 2023 to December 1, 2023.

IT IS SO ORDERED.

DATED this 22nd day of November 2023.

Jamal N. Whitehead

United States District Judge

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